

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Kelly Taylor,

Plaintiff,

v.

Lezama, Lester and Associates, LLC,

Defendant.

:
:
: Civil Action No.: 4:12-cv-00780-Y
:
:
:
:
:
:
:
:
:

**PLAINTIFF'S RENEWED MOTION TO ENFORCE
THE SETTLEMENT AGREEMENT**

Plaintiff, Kelly Taylor, by and through her undersigned counsel, hereby respectfully requests that the Court enforce the parties' fully executed settlement agreement and order Defendant to comply with its terms forthwith. In support of this motion, Plaintiff submits the annexed Memorandum of Law and Declaration of Jody B. Burton, Esq.

Dated: October 16, 2013

Respectfully submitted,

/s/ Jody B. Burton

Jody B. Burton, Esq.

Lemberg & Associates, LLC

14785 Preston Road, Suite 550

Dallas, TX 75154

Tel: (203) 653-2250

Fax: (203) 653-3424

jbarton@lemberglaw.com

Attorneys for Plaintiff

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1, I certify that, on September 19, 2013, I conferred with Defendant regarding the relief requested in this motion. Defendant opposes such relief.

/s/ Jody B. Burton
Jody B. Burton, Esq.

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that, on October 16, 2013, a true and correct copy of the foregoing Renewed Motion to Enforce the Settlement Agreement and supporting documents was filed electronically by the U.S. District Court for the Northern District of Texas Electronic Document Filing System (ECF). A copy of this Notice was sent via First Class Mail, postage-pre-paid, to the following party:

Lezama, Lester & Associates, LLC
2216 West Meadowview Road, Suite 205
Greensboro, NC 27407

/s/ Jody B. Burton
Jody B. Burton, Esq.